

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Civil Action No. 1:17-cv-53

NATIONAL ASSOCIATION FOR  
RATIONAL SEXUAL OFFENSE  
LAWS; NC RSOL; and JOHN DOE,

Plaintiffs,

v.

JOSHUA STEIN, Attorney General of  
the State of North Carolina;

DISTRICT ATTORNEYS

Lorrin Freeman (District 10), Pat  
Nadolski (District 15A), and Kristy  
Newton (District 16A),

Defendants.

**DEFENDANTS' MOTION TO EXCLUDE  
THE EXPERT REPORT OF  
DREW DOLL**

NOW COME Defendants, by and through counsel, and moves to exclude the expert report and opinion of Drew Doll pursuant to Rule 702, Federal Rules of Evidence, and *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993). Plaintiffs have offered Doll's opinion that North Carolina's sex offender registry ("the Registry") "replicates and is more severe than the requirements of probation and supervised release," in support of their motion for summary judgment. (D.E. 92-1) Doll's opinions should be excluded under *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993), and its progeny because Doll's analysis is largely anecdotal and does not rely upon any particular type of expertise, scientific methodology, or principles. Furthermore, Doll lacks

the requisite knowledge, skill, experience, training, or education to qualify as an expert pursuant to Federal Rule of Evidence 702.

A memorandum of law is filed contemporaneously herewith.

This the 21st day of September, 2020.

JOSHUA H. STEIN  
Attorney General1

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### **CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the **DEFENDANTS' MOTION TO EXCLUDE** with the Clerk of Court using the CM/ECF system which will send notification of such filing to counsel for Plaintiff:

Paul Dubbeling  
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This the 21st day of September, 2020.

/s/Tamika L. Henderson  
Tamika L. Henderson  
Special Deputy Attorney General